

## REMARKS

In an effort to bring prosecution on this case to an end, claim 17 (which technically might have been objected to rather than indicated allowed) has been rewritten into independent form and claim 15 is cancelled.

Claim 1 is rejected as obvious under Section 103(a) over a combination of Rudd US Publication 2004/0003927 and Brissette USP 6,698,076. Taking into account the Response to Arguments with regard to claim 1 the Examiner's first point is that claim 1 is silent as to where the expansion takes place. Claim 1 is amended to expressly indicate that the expansion occurs as part of the manufacturing process before insertion into a subterranean location.

The Examiner contends that claim 1 allows for the possibility of welding when joining the base pipe to the filter layer. Claim 1 is amended to indicate that such securing is exclusively by expansion.

Referring to Brissette the Examiner observes that the members of Brissette move axially but are still "connected" to each other using the process of pressure in the inner tubular against the outer tubular that is surrounded by a die, while applying heat. It is noted that the method in this reference creates a gap between the expanded members as a result of differential shrinking when the applied heat is removed. To clearly distinguish this reference whether combined with Rudd or with Broome USP 6,305,468 claim 1 states that the securing of the base pipe and the filter layer is into contact and in a way where they do not relatively translate. While Brissette provides a "connected" relationship, as contended by the Examiner, Brissette is inoperative without the ability to translate when such a "connected" relationship exists. Claim 1 defines the connection in a manner Brissette is incapable of achieving regardless of whether it is combined with Rudd or Broome.

Allowance of all the claims is respectfully requested.

Respectfully submitted,

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Date

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